

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

MDL No. 2804
Case No. 17-md-2804
Judge Dan Aaron Polster

This document relates to:
*The Government of Puerto Rico v. Teva
Pharmaceutical Industries, Ltd. et al.,
Case No. 1:22-op-45007*

**THE GOVERNMENT OF PUERTO RICO’S MOTION FOR
JUST COSTS AND ACTUAL EXPENSES**

COMES NOW Plaintiff, the Government of Puerto Rico (“the Government” or “Puerto Rico”), through its undersigned counsel, pursuant to 28 U.S.C. § 1447(c), and respectfully moves this Honorable Court to award the Government just costs and actual expenses incurred on the Government when the Defendant Actavis Laboratories FL asserted a groundless removal theory that multiple courts across the country uniformly rejected in at least a dozen different cases, then consented to remand.

Actavis has improperly removed this case, and the Government therefore moves this Honorable Court for an Order for just costs and actual expenses. In support of its motion, the Government files the attached memorandum of law.

WHEREFORE, the Government of Puerto Rico respectfully requests that this Honorable Court enter an Order granting its Motion For Just Costs and Actual Expenses.

RESPECTFULLY SUBMITTED this 29th day of March, 2022.

**HON. DOMINGO EMANUELLI
SECRETARIO DE JUSTICIA
DEPARTAMENTO DE JUSTICIA**

GOBIERNO DE PUERTO RICO

P.O. Box 9020192
San Juan, Puerto Rico 00902-0192
Tel: (787) 721-2900

s/Andrés W. López

Andrés W. López
USDC-PR No. 215311

**THE LAW OFFICES OF
ANDRÉS W. LÓPEZ, P.S.C.**

P.O. Box 13909
San Juan, PR 00908
Tel. (787) 294-9508
andres@awllaw.com

s/Linda Singer

Linda Singer
David Ackerman
Sara Aguiñiga
Pro Hac Vice to be Submitted

MOTLEY RICE LLC

401 9th Street, NW
Suite 630
Washington, DC 20004
Tel. (202) 386-9626
Fax (202) 386-9622
lsinger@motleyrice.com
dackerman@motleyrice.com
saguiniga@motleyrice.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of March 2022, I caused the foregoing document to be electronically filed with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

/s/Linda Singer

Linda Singer